

To: "mostefficient@energystar.gov"
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Subject: comment on highly efficient window products (top tier)

Before you start to specify product you need to evaluate the savings in annual energy bill for a consumer who chooses a current energy star rated product versus the new criteria for top tier. A .30 U value compared to R5 .22 U Value saves under 100/year in most geographic areas. They can be verified on Cardinal Glass website where they have an energy savings calculator based on house style and zip code. Significantly increasing the cost by going to triple pane which significantly opens up glass failure, heat buildup between the glass and slows manufacturing which adds costs is not the answer unless it can be justified by energy savings pay back in a reasonable period of time.

There are far better investments and ways to reduce energy dependence than to mandate lower than a .30. For instance - make single pane glass illegal. Make dual pane with one coat of low E and Argon fill mandatory in all new construction and replacement applications. These two changes will save much more than the difference between .30 and .22 U values and can be efficiently produced at a reasonable price to the consumer.

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